

SOUTH DELTA WATER AGENCY

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TO: Ms. Delores Brown E-mail delores@water.ca.gov
Department of Water Resources

FROM: Alex Hildebrand
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This letter conveys comments on the March 24 meeting which announced a series of Scoping Meetings for a Bay Delta EIR/EIS, and which discussed the approach to that process.

The suitability and timeliness of the process must be viewed as a step in a larger process for correcting the current failure to protect the Delta and to provide the water needed both in and from the Delta. The scoping process is designed to lead to implementation of a particular plan to be determined by the Bay Delta Conservation Process, BDCP. It is not designed to determine whether that plan is a viable solution, and whether there may be other more effective plans. It was clear that the scoping sessions are not intended to lead to unbiased consideration of other plans. The scoping process will merely meet a process requirement while a BDCP plan is moved toward implementation.

The BDCP process is dominated by parties who entered the process with a belief that there should be some sort of "peripheral" or Dual Facility canal. They pretended to believe that substantially improved protection of the Delta could be provided while providing more reliable exports through a canal. They did not obtain and make public an independent analysis that would reveal that it is physically impossible to operate a canal without trashing the Delta. To declare that the Delta would be protected while operating a canal is as futile as declaring that henceforth it will be full moon every night.

The proposed scoping process does not propose to examine questions of feasibility before developing an EIR/EIS for a specific plan. It does not propose to have all plans checked by an independent scientific review team. The Science Review Committee for the Vision Process is not independent (its membership overlaps with the Public Policy Institute advocacy group). It is also apparently unwilling and incompetent to address questions of hydraulics, salinity, land use, and levee design. They have proposed that levees be abandoned without regard to the consequences of converting the channel system to an open bay. The fishery agencies have apparently not been made aware of the potential for converting the Delta to a salty open bay.

For all these reasons the scoping process appears to be highly disingenuous.